

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

GLOBAL MARINE SYSTEMS LIMITED,)	
)	
Plaintiff,)	
)	
v.)	Case No. 05-11605-RGS
)	
TYCO TELECOMMUNICATIONS (US) INC.)	
and TRANSOCEANIC CABLE SHIP CO. INC.,)	
)	
Defendants.)	
)	

JOINT MOTION FOR STAY OF ACTION PENDING SETTLEMENT

Defendants Tyco Telecommunications (US) Inc. and Transoceanic Cable Ship Company, Inc. (together, "Defendants") and Plaintiff Global Marine Systems Limited ("Plaintiff"), by and through undersigned counsel, hereby inform the Court that they have reached a settlement in principle of this action, and are in the process of drafting settlement papers for execution.

In light of these developments, the parties hereby jointly move to stay all proceedings in this case pending the drafting and execution of settlement papers. The parties further propose that they shall advise the Court no later than Friday, October 27, 2006, as to the status of the settlement. A proposed Order is attached.

Respectfully submitted,

/s/ Eric J. Frick

Stephen R. Delinsky (BBO # 119120)
Erik J. Frick (BBO # 553336)
ECKERT SEAMANS CHERIN
& MELLOTT LLC
One International Place
Boston, Massachusetts 02110
(617) 342-6800 (telephone)
(617) 342-6899 (fax)

/s/ Eric J. Marandett

Eric J. Marandett (BBO #561730)
Daniel C. Winston (BBO #562209)
Mark S. Freeman (BBO #636290)
Stacy L. Blasberg (BBO #657420)
CHOATE, HALL & STEWART LLP
Two International Place
Boston, Massachusetts 02110
(617) 248-5000 (telephone)

David C. Kiernan (admitted *pro hac vice*)
John L. Cuddihy (admitted *pro hac vice*)
WILLIAMS & CONNOLLY LLP
725 Twelfth Street, N.W.
Washington, D.C. 20005
(202) 434-5000 (telephone)
(202) 434-5029 (fax)

(617) 248-4000 (fax)

*Attorneys for Plaintiff Global Marine Systems
Limited*

Dated: October 6, 2006

*Attorneys for Defendants Tyco
Telecommunications (US) Inc. and
Transoceanic Cable Ship Company, Inc.*

Dated: October 6, 2006

CERTIFICATE OF SERVICE

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on 10/6/06

By: David J. Frisch

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

GLOBAL MARINE SYSTEMS LIMITED,)
)
)
Plaintiff,)
)
v.) Case No. 05-11605-RGS
)
TYCO TELECOMMUNICATIONS (US) INC.)
and TRANSOCEANIC CABLE SHIP CO. INC.,)
)
Defendants.)
)

**ORDER GRANTING JOINT MOTION
FOR STAY OF ACTION PENDING SETTLEMENT**

This matter is before the Court upon the Joint Motion of Defendants Tyco Telecommunications (US) Inc. and Transoceanic Cable Ship Company, Inc., (“Defendants”) and Plaintiff Global Marine Systems Limited (“Plaintiff”) for an order staying all proceedings in this case pending the drafting and execution of settlement papers.

It is hereby **ORDERED** that the Joint Motion be and hereby is **GRANTED**; and it is

FURTHER ORDERED that the parties shall advise the Court no later than Friday, October 27, 2006, as to the status of the settlement.

DONE AND ORDERED on this _____ day of _____, 2006.

The Honorable Richard G. Stearns
United States District Judge

Copies to:

Stephen R. Delinsky
Erik J. Frick
ECKERT SEAMANS CHERIN & MELLOTT LLC
One International Place
Boston, Massachusetts 02110

David C. Kiernan
John L. Cuddihy
WILLIAMS & CONNOLLY LLP
725 Twelfth Street, N.W.
Washington, D.C. 20005

Eric J. Marandett
Daniel C. Winston
Mark S. Freeman
Stacy L. Blasberg
CHOATE, HALL & STEWART LLP
Two International Place
Boston, Massachusetts 02110